

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2018-211-T**

Kevin Marra,  
Complainant/Petitioner

PREFILED DIRECT TESTIMONY  
OF CAMERON BRIGHT

v.

JMS Worldwide, LLC,  
Defendant/Respondent.

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Cameron Bright, I am Regional Director of Operations of JMS Worldwide,  
3 LLC ("JMS"). My business address is 2818-A Industrial Ave, North Charleston SC 29405

4 **Q. What are your duties at JMS?**

5 A. I schedule and supervise moving crews and serve as the company's contact with customers  
6 during a move.

7 **Q. Were you present on April 19, 2018 for JMS's move of Kevin and Marinés Marra's**  
8 **belongings from an apartment at 515 Robert Daniel Drive on Daniel Island?**

9 A. Yes.

10 **Q. Who was present for the move?**

11 A. I was there with a three man crew that packed and moved the Marras' belongings. Mrs.  
12 Marra was also present.

13 **Q. Were there circumstances that made the move difficult?**

14 A. Yes. We were not able to park our truck in front of the Marras' apartment. The apartment  
15 manager made the crew move it across the parking lot so as to not block the exit of the apartment's

1 parking garage. The extra distance required to reach the truck extended the time it took to load  
2 the Marras' belongings.

3 **Q: Who prepared the bill of lading for the move?**

4 A. I did.

5 **Q. How did you go about preparing the bill of lading?**

6 A. I added up the manhours spent packing and moving the truck, the charges for packing  
7 materials, and our other tariffed charges. I also estimated that we would have 1 hour of travel time  
8 and it would take our crew 5.5 hours to unpack the truck and store the goods in the warehouse.

9 **Q. Did you present the bill of lading to the customer?**

10 A. Yes. I gave it to Mrs. Marra and explained the charges. A copy of the bill of lading is  
11 attached as Exhibit CB-1 to my testimony.

12 **Q. What did Mrs. Marra do after you presented the bill of lading to her?**

13 A. I recall that Mrs. Marra wanted to consult her husband about which credit card she should  
14 use to pay. She took a picture of the bill of lading with her phone and sent it to him. They had a  
15 brief telephone conversation, and then she paid me.

16 **Q. Did you prepare the inventory attached as Exhibit CB-2 to your testimony?**

17 A. Yes, I did. It is an inventory of the Marras' goods that were moved to the warehouse.

18 **Q. Did Mrs. Marra complain about the charges that day?**

19 A. No.

20 **Q. Did you speak with Mr. Marra that day?**

21 A. Yes. I spoke with him by telephone and briefly explained the charges.

22 **Q. How would you describe the tone of your conversation with Mr. Marra?**

23 A. It was brief and cordial.

1    **Q.     What was the tone of your conversation with Mrs. Marra?**

2    A.     It was also cordial.

3    **Q.     Did you threaten or intimidate Mrs. Marra?**

4    A.     No.

5    **Q.     Were you present on May 8, 2018, when Mr. and Mrs. Marra's goods were**  
6    **transferred to the Smooth Move company from JMS's warehouse?**

7    A.     Yes.

8    **Q.     What was required to transfer the goods to Smooth Move**

9    A.     The Marras' goods were in the back of our warehouse because we were led to believe they  
10   would be stored with JMS for an extended period of time. When Mr. Marra demanded the transfer  
11   in May, we had to move them out of the back of the warehouse, requiring us to rearrange other  
12   shipments that were in front of them.

13   **Q.     Did you compute the charge for transferring the goods from the warehouse?**

14   A.     Yes.

15   **Q.     How did you arrive at \$1,192?**

16   A.     It took four men eight hours to complete the job.

17   **Q.     Was this your last interaction with the Marras' belongings?**

18   A.     Yes.

## EXHIBIT CB-1

1-ORIGINAL - NOT NEGOTIABLE

## EXHIBIT CB-2



AMS WORLDWIDE, LLC  
2018-A INDUSTRIAL AVENUE, NORTH CHARLESTON, SC 29405  
800-957-3550 • WWW.JOHNSONMOVING.NET • POC 9781-C

## HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

KEVIN MAIA  
JMS WORLDWIDE LLC  
315 Robert Daniel Drive Charleston S.C. 29492  
2018 - Industrial Ave Charleston S.C. 29405  
Carle Amsterdam, 308, Mexico City Hippodromo, Carle

DESCRIPTIVE SYMBOLS  
BW - BLACK & WHITE TV  
C - CORD ON TV  
EP - CARRIER PACKED  
FP - PACKED BY OWNER  
CD - CARRIER DISASSEMBLED  
SW - STRETCH WRAPPED  
DND - DISASSEMBLED BY OWNER  
PB - PROFESSIONAL BOOKS  
PE - PROFESSIONAL EQUIPMENT  
PP - PROFESSIONAL PAPERS  
MOU - MECHANICAL CONDITION UNKNOWN

RE - RENT  
BR - BROKEN  
BU - BURNED  
CH - CHIPPED  
CU - CONTENTS  
& CONDITION UNKNOWN

EXCEPTION SYMBOLS  
D - DENTED  
F - FALLEN  
S - SOILED  
L - LOST  
M - MISSING  
MD - MOUTH EATEN  
P - PEST HITS  
R - RUSTED  
RU - RUSTED  
SC - SCRATCHED  
SH - SHARP  
SO - SOILED  
ST - STAINED  
S+ - STRETCHED  
T - TORN  
W - BADLY WORKED  
Z - CRACKED

LOCATION  
1. ARM  
2. BOTTOM  
3. CORNER  
4. FRONT  
5. LEFT  
6. LEGS  
7. REAR  
8. FROM  
9. SIDE  
10. TOP  
11. VENT  
12. BACK  
13. DEN  
14. INSIDE

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION	ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN
1		001 Box pp.s ✓	Used	CU	6		Box CASE ✓	USED
2		002 Box pp.s ✓	Used	CU	7		Bike ✓	USED
3		003 Safe pp.s ✓	Used	✓	8		Bike ✓ 15	USED
4		004 Box pp.s ✓	Used	✓	9		TABLE S ✓	USED
5		005 Box pp.s ✓	Used	CU	0		monitor S ✓	USED
6		006 Box pp.s ✓	Used	CU	1		End TABLE S ✓	USED
7		007 Box CU ✓	Used	CU	2		Box CLUBS	USED
8		008 Box CU	Used	CU	3		BUCKET	USED
9		009 Box CU	Used	CU	4		Blue Bag	USED
0		010 Box CU	Used	CU	5		Black Bag	USED
1		011 Box CU	Used	CU	6		Chain	USED
2		012 Box CU	Used	CU	7		Chain	USED
3		013 Box CU	Used	CU	8		Chain	USED
4		014 CU	Used	✓	9		Chain	USED
5		015 Cabinet pp.s ✓	Used	✓	0		Air Pump	USED
6		016 Dresser pp.s ✓	Used	✓	1		out door BAG	USED
7		017 2 Chairs pp.s ✓	Used	✓	2		SARF Lamp	USED
8		018 Box CU	Used	CU	3		LAWN CHAIR	USED
9		019 Box CU	Used	CU	4		LAWN CHAIR	USED
0		020 Box CU	Used	CU	5		Iron Board	USED
1		021 Box CU	Used	CU	6		BLACK BAG	USED
2		022 Box CU	Used	CU	7		Air Pump	USED
3		023 Box CU	Used	CU	8		TARE BAST	USED
4		024 Box CU	Used	CU	9		SARIS	USED
5		025 Box CU	Used	CU	0		METAL DACK	USED
6		026 Box CU	Used	CU	1		BLACK STAND	USED
7		027 Box CU	Used	CU	2		3 TAMPIN RLOCKS	USED
8		028 CU	Used	CU	3		LAMP	USED
9		029 CU	Used	CU	4		TRASH CAN	USED
0		NIGHT STAND	USED	CU	5		MED BOX	USED
1		BED RAIL	USED	CU	6		MED BOX	USED
2		Jewelry Box	USED	CU	7		MED BOX	USED
3		MED BOX	USED	CU	8		CLOTHES BOX	USED
4		TABLE	USED	CU	9		WHITE BAG	USED
5		END TABLE	USED	CU	0		BLACK BAG	USED

ITEM NO.	REMARKS/EXCEPTIONS
	VACUUM
	Chair
	Chair
	Box

\* WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED \*

WARNING

BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OF DAMAGE IN SPACE ON THE RIGHT ABOVE.

TAPE LOT NO.

TAPE COLOR

NOS. FROM

THRU

AT ORIGIN

CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)

DATE

AT DESTINATION

CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)

DATE

(SIGNATURE) OWNER OR AUTHORIZED AGENT

DATE

(SIGNATURE) OWNER OR AUTHORIZED AGENT

DATE

(SIGNATURE)

(SIGNATURE)

Lot No. GN0029  
092  
JOHNSON'S MOVING

Lot No. GN0029  
091  
JOHNSON'S MOVING

Lot No. GN0029  
090  
JOHNSON'S MOVING

Lot No. GN0029  
089  
JOHNSON'S MOVING

Lot No. GN0029  
088  
JOHNSON'S MOVING

Lot No. GN0029  
087  
JOHNSON'S MOVING

Lot No. GN0029  
086  
JOHNSON'S MOVING

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

KEVIN MARRA

AGENT

Jms worldwide LLC

SIS ROBERT DANIEL DRIVE CHARLESTON S.C 29405  
2818-INDUSTRIAL AVE CHARLESTON S.C 29405

PAUSE NO. NOS OF PAGES  
CARRIER'S REFERENCE NO.  
CONTRACT OR GEN NO.  
GUYT SERVICE ORDER NO.  
VAN NUMBER

DESCRIPTIVE SYMBOLS

SW - BLACK & WHITE TV  
C - CORDON TO  
CP - CARRIER PACKED  
WD - WOODEN PACKED  
DD - DARTON DISASSEMBLED  
BN - BENTON BENTONED

DD - DISASSEMBLED BY CARRIER  
PS - PREPARED BY CARRIER  
PE - PREPARED BY EQUIPMENT  
PP - PREPARED BY PAPER  
ME - MECHANICAL CONDITION  
UN - UNKNOWN

BE - BENT  
BR - BROKEN  
BU - BURST  
CH - CHIPPED  
CU - CONTENTS  
& CONDITION UNKNOWN

EXCEPTION SYMBOLS

D - DENTED  
F - FROCKED  
S - SQUARED  
L - LOCKED  
M - MARKED  
N - NESTED

MO - MOUTH EATEN  
P - PEELING  
R - RUSTED  
SC - SCRATCHED  
SH - SHORT

SO - SOILED  
ST - STAINED  
S - STRETCHED  
T - TORN  
W - BADLY WORN  
Z - CRACKED

LOCATION SYMBOLS

1. ARM 8. FRONT 15. BEAT  
2. BOTTOM 9. SIDE 16. DRAWER  
3. CORNER 10. TOP 17. DOOR  
4. FRONT 11. VENEER 18. BHELP  
5. LEFT 12. EDGE 19. HARDWARE  
6. LEGS 13. CENTER  
7. REAR 14. INSIDE

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES

CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEP (IF A AT DEST)	Lot No.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
1		WOOD BOX	USED	W	GN0029			
2		MATRESS	USED	W	100			
3		BOX SPRING	USED	W	JOHNSON'S			
4		HEAD BOARD	USED	W	MOVING			
5		PICTURE	USED	W				
6		PICTURE	USED	W	Lot No.			
7		PICTURE	USED	W	GN0029			
8		BENCH	USED	W	099			
9		MONITOR	USED	W	JOHNSON'S			
0		PICTURE	USED	W	MOVING			
1		PICTURE	USED	W				
2		STAND	USED	W	Lot No.			
3		FOOT BOARD	USED	W	GN0029			
4		MED BOX	USED	W	098			
5		MED BOX	USED	W	JOHNSON'S			
6		LARGE SOFA	USED	W	MOVING			
7								
8								
9								
0								
1								
2								
3								
4								
5								
6								
7								
8								
9								
0								
1								
2								
3								
4								
5								

ITEM NO. REMARKS/EXCEPTIONS

Lot No. GN0029 096 JOHNSON'S MOVING

Lot No. GN0029 095 JOHNSON'S MOVING

Lot No. GN0029 094 JOHNSON'S MOVING

Lot No. GN0029 093 JOHNSON'S MOVING

\*WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED TO THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED\*

WARNING BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OF DAMAGE IN SPACE ON THE RIGHT ABOVE.

NOS. FROM

TAPE COLOR

THRU

AT ORIGIN

CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)

DATE

AT DESTINATION

CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)

DATE

(SIGNATURE) OWNER OR AUTHORIZED AGENT

DATE

(SIGNATURE) OWNER OR AUTHORIZED AGENT

DATE

(SIGNATURE)

(SIGNATURE)